WINNEBAGO TRIBE OF NEBRASKA

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Date: May 9, 2011

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FCC Mail Room

To: F

Federal Communications Commission

Re:

Improving Communications Services for Native Nations (CG Docket No. 11-41,

FCC 11-30)

As Chairman of the Winnebago Tribe (The Tribe) of Nebraska located in Thurston County, I respectfully write this letter in support of the Federal Communications Commission's (FCC or Commission) efforts to improve communication services on Indian reservations. The Tribe acknowledges and appreciates the Commission's recognition of the massive digital divide prevalent on most reservations, as well as the FCC's commitment to facilitate access to emerging telecommunication services and technologies. We sincerely thank you for placing Native Nations at the forefront of these crucial efforts, and we applaud the establishment of the FCC Office of Native Affairs and Policy. We look forward to working with that department to bring communications on Tribal lands into the 21st century.

In Winnebago, lack of access to robust and affordable telecommunication services, especially broadband high-speed Internet service, seriously impedes our efforts to promote economic, educational, employment, communication and social opportunities for our community. In addition, vital cultural preservation methods, telemedicine or health-related efforts, and public safety communications lag behind those opportunities and services available in urban areas. Unfortunately, this formidable barrier compromises our inherent right to self-determination and the ability to shape our future.

As stated in the National Broadband Plan, "Broadband is becoming a prerequisite to economic opportunity for individuals, small businesses and communities. Those without broadband and the skills to use broadband-enabled technologies are becoming more isolated from the modern American economy". I would add that the American economy is now being absorbed into the *global* economy. Although the Winnebago community has Digital Subscriber Line (DSL) connectivity, service is offered at an extremely slow dial-up speed. Our current state of telecommunications infrastructure is insufficient to support economic development that would attract new businesses or sustain electronic commerce locally, let alone globally. In addition, with a poverty rate two times higher than that of the state of Nebraska, many Thurston County residents cannot afford the monthly DSL subscription fee. Thus, pertinent online resources and opportunities remain virtually inaccessible. In effect, these unwarranted circumstances perpetuate the marginalization of Native Americans.

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List A B C D E

By definition, with the Winnebago community falling into the technologically underserved category, access to funding is problematic. Technologically underserved areas are not eligible to apply for the Community Connect Program through the Rural Utilities Service. Programs such as the Broadband Technology Opportunities Program (BTOP) should require coordination across many levels – private and public – to ensure fiber-optic communication backbones are built with equitable access for both underserved and unserved Indian reservations.

Adoption of an FCC Native Nations Priority would help us provide sustainable telecommunications infrastructure and services to our communities. This course of action would help to foster competition and lower costs, as well as provide local jobs and support businesses. In our case, with the relatively youthful composition of the Winnebago population, local jobs are needed to encourage young residents to remain in the community. With the skyrocketing cost of fuel, commuting long distances to work in urban areas can become prohibitive. In terms of economic development, the Nebraska Department of Economic Development lists twelve primary industry clusters that represent a balanced portfolio of growth opportunities and perform strongly in employment measures. While Winnebago is home to some of those businesses, such as transportation, warehousing and distribution logistics, in order to draw more diverse companies in need of a local workforce, technological development and advancement are key priorities.

With limited and dwindling funding sources, immediate and sweeping reform of the Universal Service Fund (USF) is necessary to help build and sustain broadband infrastructure in Indian Country. In addition, a National Digital Literacy Program and National Digital Literacy Corp (including subsidies and computer classes) would complement USF reform by assisting community non-adopters to learn the basics and benefits of technology. Moreover, to support development of fiber-optic telecommunication backbones, establishment of a Native Nations Broadband Fund is long overdue. Relevant issues, for example, Tribal-centric priorities and administration, including allocation of such a fund, should be decided with input from Tribal representatives speaking for all of the underserved and unserved areas.

Adoption and implementation of these proposals would go far to help alleviate the vast digital divide and improve the overall quality of life on Tribal lands. Without such measures, Winnebago and other technologically underserved and unserved Indian reservations will not be able to access basic local opportunities, let alone those on a global scale. Again, thank you for your dedicated efforts on our behalf and for seeking our input related to this significant matter.

Respectfully submitted,